

NO. 351378

COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON

Luz Castellon and Juan Castellon,

Plaintiffs/Respondents,

v.

Sergio Rodriguez,

Defendant/Appellant.

RESPONDENTS' BRIEF

MONA J. GEIDL, WSBA#42455
Attorney for Respondents

MINNICK • HAYNER, P.S.
P.O. Box 1757/249 West Alder
Walla Walla, WA 99362
(509) 527-3500
mona@minnickhayner.com

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I.

INTRODUCTION

Appellant puts forth several arguments as to why a summary judgment ordered against him should now be vacated. However, this case has nothing to do with access to justice. This case has everything to do with appellant's unwillingness to pay for significant damages his family caused to respondent's rental property.

It is undisputed that appellant paid the respondent monthly rent, including August 2016 rent. It is undisputed that the appellant's wife was personally served with the Complaint, Summons, Motion and Order to Show Cause in the underlying unlawful detainer action. It is also undisputed that appellant's wife and children were occupying the rental property past August 31, 2016 when they were to have vacated the premises. It is undisputed that the appellant was personally served with the Motion for Judgment and Judgment Summary, Declaration of Juan Ramon Castillo, Cost Bill and Note for Motion Docket. It is also undisputed that the appellant appeared at the September 12, 2016 hearing and requested an interpreter, and then on September 13, 2016, with assistance of a court interpreter appeared and argued his case. It is undisputed that the appellant did not submit a written answer or contest the Motion for Judgment and Judgment Summary and accompanying

declarations until respondent's legal counsel garnished appellant's wages (well after the thirty days in which he had to appeal the judgment).

Prior to moving out of the rental unit, appellant's family caused significant damage to respondents' rental property. The windows were broken out of the home, door frames and linoleum were significantly damaged, feces was left in the toilet, children's drawings were scrawled on a door and interior wall of the home, and the property was significantly damaged above and beyond normal wear and tear. Appellant now argues that he should not be responsible for these costs of repair because he was allegedly separated from his wife and claimed to have previously moved out. However, the couple had not filed for legal separation, appellant's wife and children still occupied the home, and appellant himself could not provide the court commissioner with a new residential address at the time of the September 13, 2016 hearing.

Respondents complied with all of the Rules of Civil Procedure required of them in this case, gave appellant notice and an opportunity to respond, and pled all requested damages in either the Complaint and/or the later filed Motion for Judgment and Judgment Summary and accompanying Declarations. For these reasons, respondent requests the Judgment and Judgment Summary be affirmed.

II.

STATEMENT OF THE CASE

A. Factual Background

Appellant Sergio Rodriguez rented residential real property located at 428 S. 8th Avenue, Walla Walla, Washington under a verbal month-to-month lease. CP 1. Sergio, his wife (later identified as Angela Rodriguez), and their children occupied the premises. CP 1. Sergio Rodriguez paid landlord/respondent Juan Castellon at the beginning of each month of their tenancy. CP 4. Sergio Rodriguez speaks primarily Spanish and requires the assistance of a Spanish language interpreter. CP 7.

On August 9, 2016, the appellant was served with a 20-Day Notice to Terminate requiring the tenants to vacate the premises by August 31, 2016. CP 2. The 20-Day Notice was served in accordance with RCW 59.18.200 and 59.12.030(2). CP 2. Service was valid pursuant to the Unlawful Detainer statute at RCW 59.12.040. CP 1 and CP 3. The parties failed to vacate the residence and a show cause hearing was set for Monday, September 12, 2016. CP 3, CP 4, and CP 5. A Summons, Complaint, Motion and Order to Show Cause were served by process server Blake Limburg by personal service on Angela Rodriguez on September 1, 2016. CP 6.

On September 12, 2016, appellant Sergio Rodriguez appeared at the show cause hearing and requested a Spanish language interpreter. CP 7. No interpreter was available on September 12, 2016 so the hearing was reset for the following day, September 13, 2016. CP 7. At the time of the show cause hearing, appellant still had personal property at the premises and it was unclear to the landlord whether the appellant and his family had vacated the premises. CP 8 and CP 24.

On September 13, 2016, appellant Sergio Rodriguez again attended the show cause hearing. CP 8. He was assisted by court interpreter Jeff Adams. CP 8. No writ of restitution was issued on that day based upon statements of appellant that he and his family had moved out and that they would be removing the remaining of their personal belongings in the residence in the following days. CP 8. At the time of this September 13, 2016 show cause hearing, it was unsupported by evidence other than statements made by Sergio Rodriguez that the parties were separated, no petition for legal separation or dissolution of marriage was provided, and it is assumed that neither had been filed at that time. CP 8. Angela Rodriguez and the Rodriguez children remained in the residence until just prior to the September 13, 2016 hearing. CP 8. Appellant Sergio Rodriguez had paid landlord/respondent Juan Castellon rent for the month of August 2016. CP 1, CP 4, and CP 9.

Immediately following the September 13, 2016 hearing, counsel for respondent discussed the case with defendant Sergio Rodriguez with the assistance of court interpreter Jeff Adams. CP 28.

The Walla Walla County Superior Court follows the requirements of the Washington Courts with regard to language access. Large 20 inch by 37 inch signs are mounted directly outside the superior courtroom in multiple languages, including Spanish, that direct parties how to obtain the assistance of an interpreter. Appellant was required to walk within feet of at least one of these signs in order to enter the courtroom. See attached.

After appellant's family vacated the premises at 428 8th Avenue, Walla Walla, Washington, respondent/landlord found a great deal of damage to the property above normal wear and tear. CP 9. The Complaint for Unlawful Detainer, in its Prayer for Relief, requests "judgment against the defendants for damages to the premises, such amount to be established by a supplemental affidavit supplied by the plaintiffs." CP 1.

Counsel for respondent filed a separate Motion for Entry of Judgment and Judgment Summary, Declaration of Juan Ramon Castellon, Note for Motion Docket and Cost Bill which were personally served on appellant Sergio Rodriguez at his place of employment, Taqueria Mi Pueblito, on October 31, 2016. CP 9, CP 10, CP 11, CP 12, and CP 13.

Appellant Sergio Rodriguez failed to appear and argue on the December 12, 2016 court date and judgment was entered against him. CP 15, CP 27, and CP 28. Appellant failed to appeal the judgment within 30 days of its entry of order. CP 14, CP 22.

On February 21 2017, appellant Sergio Rodriguez, through his attorney Tyler Graber of the Northwest Justice Project, filed a Motion and Memorandum in Support of a Motion to Vacate Judgment, Quash Writ of Garnishment, and Dismiss Complaint for Unlawful Detainer. CP 22, CP 23, CP 24 and CP 25. Appellant's Motion was denied and appellant now appeals. CP 31.

B. Procedural Background

Respondent served appellant with a 20-Day Notice to Terminate on August 9, 2016 which required the tenants to vacate the premises by August 31, 2016. CP 2. Service was valid pursuant to the Unlawful Detainer statute at RCW 59.12.040. CP 3, CP 4 and CP 5. Angela Rodriguez and the Rodriguez children did not vacate the premises by August 31, 2016. CP 8.

A summons, complaint, motion and order to show cause were served by personal service on Angela Rodriguez on September 1, 2016. CP 6. A show cause hearing was set for Monday, September 12, 2016. CP 7. Sergio Rodriguez personally attended the September 12, 2016 show

cause hearing and requested a Spanish interpreter. CP 7. Because no Spanish interpreter was available, the show cause hearing was reset to September 13, 2016. CP 7. At the time of the show cause hearing, the Rodriguez's still had personal property at the premises. CP 8. On September 13, 2016, appellant Sergio Rodriguez again attended the show cause hearing. CP 8. He was assisted by court interpreter Jeff Adams. CP 8.

After the Rodriguezes vacated the premises, the respondent landlord discovered that the tenants had broken most of the windows at the premises and had caused a great deal of damage. CP 9. Counsel for respondent proceeded to draft and file to a summary judgment against the appellant for the cost of repairs to the premises and for unpaid rent. CP 10, CP 11, CP 12 and CP 13.

Motion for Entry of Judgment and Judgment Summary, Declaration of Juan Ramon Castellon, Note for Motion Docket and Cost Bill which were personally served on appellant Sergio Rodriguez at his place of employment, Taqueria Mi Pueblito, on October 31, 2016. CP 13. Hearing was set more than 28 days from the date of service of the motion as required by CR 56(c) for summary judgment motions. CP 15.

Appellant Sergio Rodriguez failed to appear and argue on the December 12, 2016 court date and judgment was entered against him. CP

15. Appellant failed to appeal the judgment within 30 days of its entry of the summary judgment order. CP 14.

III.

ARGUMENTS

A. The Walla Walla County Superior Court complies with a language access plan.

Counsel for Appellant argues that Walla Walla County Superior Court failed to follow a language access plan, but provides no evidentiary proof substantiating his allegation. In fact, the Walla Walla County Superior Court follows a number of court guidelines to ensure non-English speaking parties have access to an interpreter. Large posters measuring 20 inches wide and 37 inches long are posted at the stairwell entrance to the third floor of the Walla Walla County Courthouse, as well as immediately outside the door to the courtroom. These posters direct parties in 17 different languages, including Spanish, how to request an interpreter. Appellant Sergio Rodriguez had to pass within several feet of at least one of these posters immediately prior to each trial court hearing. Further, Walla Walla County Superior Court provides free interpretation services to the parties who do not speak English. Appellant was provided use of an interpreter at the September 13, 2016 court hearing. CP 8. Respondent requests this Court of Appeals to take judicial notice of those measures

employed by the Walla Walla County Superior Court pertaining to signage and interpreter services offered to non-English speaking parties.

B. The Walla Walla County Superior Court properly refused to vacate summary judgment in favor of landlord/respondent.

Respondents' Motion for Entry of Judgment and Judgment Summary was made pursuant to CR 56 for summary judgment against defendants. CP 14. This was a summary judgment, not a default judgment as appellant now claims. CP 14. Appellant was personally served with the Motion, Declaration of Juan Ramon Castellon, Note for Motion Docket and Cost Bill. CP 13. Appellant was allowed more than 28 days to respond as required under the summary judgment rules. Appellant did not appear and argue at the hearing on Motion for Summary Judgment and there is nothing but his word to refute that he was not in the courtroom at the time the matter was called. CP 15.

Pursuant to CR 60, the court may relieve a party or its legal representative from a final judgment, order or proceedings for the following reasons:

1. Mistake, inadvertence, surprise or excusable neglect;
2. Newly discovered evidence that, with reasonable diligence, could not have discovered in time to move for a new trial under Rule 59(b);
3. Fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;

4. The judgment is void;
5. The judgment has been satisfied, released, or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or
6. Any other reason that justifies relief.

CR 60.

This rule is codified in RCW 4.72. “The judgment shall not be vacated on motion or petition until it is adjudged that there is a valid defense to the action in which the judgment is rendered...” RCW 4.72.050.

Once a judgment is final, a court may reopen it only if authorized by a statute or court rule. *Rose ex rel. Estate of Rose v. Fritz*, 15 P.3d 1062, 104 Wash.App. 116 (2001). Reopening or vacating judgment is limited to situations involving extraordinary circumstances. The circumstances must relate to irregularities which are extraneous to the action of the court or go to the question of the regularity of its proceedings. CR 60(b)(11); *Knies v. Knies*, 979 P.2d 482, 96 Wash.App. 243 as amended (1999). Application of the rule setting forth general conditions under which a party may seek relief from judgment is within the discretion of the trial court, and will be reviewed only for abuse of discretion. CR 60, *In re Marriage of Shoemaker*, 904 P.2d 1150, 128 Wash.2d 116 (1995). A motion to vacate the judgment is to be considered

and decided by the trial court in exercise of its discretion, and its decision should not be overturned on appeal unless it plainly appears that this discretion has been abused. CR 60; *Matter of Guardianship of Adamec*, 667 P.2d 1085, 100 Wash.2d 166 (1983). Motions to vacate a prior judgment are addressed to the sound discretion of the trial court, whose judgment will not be disturbed absent a showing of manifest abuse of discretion, i.e. only when no reasonable person would take the position adopted by the trial court. *In re Marriage of Burkey*, 675 P.2d 619, 36 Wash.App. 487 (1984).

Here, appellant cannot show any evidence of mistake, inadvertence, excusable neglect or fraud under CR60(b)(1). Nor was this an erroneous proceeding against a minor or incompetent person under CR 60(b)(2). There was no newly discovered evidence which by due diligence could not have been discovered prior to hearing. CR 60(b)(3). There was no fraud, misrepresentation or misconduct on the part of respondent. CR 60(b)(4). The judgment is not void and it has not been satisfied. CR 60(b)(5) and (6). There was no death, unavoidable casualty or error in judgment shown by a minor. CR 60(b)(8),(9), and (10). Thus, appellant can only vacate the judgment by showing that irregularities occurred during the proceedings. For the following reasons, respondent argues that

no irregularities occurred during the proceedings that justify vacating the judgment.

1. The Walla Walla County Superior Court had jurisdiction to proceed against appellant and his marital community.

Where a defendant wife is personally served, the trial court has jurisdiction to proceed against the community in a creditor's action asking the court to find a community liability. *Oil Heat Co. of Port Angeles, Inc. v. Sweeney*, 26 Wash.App. 351, 356 (1980). In the case of *Sweeney*, the Court of Appeals reasoned that although a husband and wife were residing separate and apart at the time the debt was incurred, that "under the terms of RCW 26.16.030 which permits either spouse to manage community property, service of process upon either spouse and a resulting judgment for a community obligation is enforceable against the community." *Id.* at 356 citing *Komm v. Department of Social and Health Serv.*, 23 Wash.App. 593, 598-99, 597 P.2d 1372 (1979).

Here, it is undisputed that defendant Angela Rodriguez, appellant's wife, was personally served with the summons, complaint, motion and order to show cause. CP 6. Thus, the trial court had jurisdiction to proceed against the Rodriguez marital community.

2. The Walla Walla County Superior Court had jurisdiction as to appellant through waiver.

Further, appellant waived any objections to personal jurisdiction by appearing and arguing on September 12, 2016 and again on September 13, 2016. CP 7 and CP 8. Generally, a party who fails to raise a personal jurisdiction defense in any entry of appearance, pleadings, or answers waives that defense and submits himself or herself to the jurisdiction of the court. *Northwest Cascade, Inc. v. Unique Construction, Inc.*, 187 Wash.App. 685 (2015).

In the present case, appellant had notice of the summons and complaint that was personally served on his wife. CP 7 and CP 8. Thereafter, appellant appeared at hearing on September 12, 2016 and requested an interpreter. CP 7. Appellant then appeared again at hearing on September 13, 2016. CP 8. Appellant failed to raise personal jurisdiction as a defense at either hearing. CP 7 and CP 8.

Appellant himself was personally served with a separate Motion for Entry of Judgment and Judgment Summary, Declaration of Juan Ramon Castellon, Note for Motion Docket and Cost Bill, served at his place of employment, Taqueria Mi Pueblito, on October 31, 2016. CP 13. Appellant failed to file an answer or raise lack of personal jurisdiction at any time prior to entry of judgment. CP 14. Thus,

appellant had several opportunities to raise lack of personal jurisdiction as a defense prior to entry of judgment. By failing to do so, appellant availed himself of the jurisdiction of the trial court.

3. Appellant/tenant was liable for a debt incurred on behalf of the marital community.

A debt incurred by either spouse during marriage is presumed to be a community debt. *Oil Heat Co. of Port Angeles, Inc. v. Sweeney*, 26 Wash.App. 351, 354 (1980). This presumption may only be overcome by clear and convincing evidence. *Id.* at 355. Mere physical separation of the parties does not establish that they are living separate and apart sufficiently to negate the existence of a community. *Id.* The presumption of a community liability will not be refuted if there was any expectation of community benefit from the transaction for which the debt was contracted. *Id.*

In the present case, the debt originally arises out of rental of the home located at 428 S. 8th Avenue, Walla Walla, Washington, where appellant Sergio Rodriguez, his wife Angela Rodriguez, and the couple's children lived. CP 1, CP 4 and CP 27. At the time respondents filed their summons, complaint and motions, appellant and his wife were still legally married. No evidence was presented at any time that the couple had filed for legal separation, and it is

assumed that no such legal separation was filed prior to the commencement of this action. CP 8. Because the family lived together in the home at 428 S. 8th Avenue, Walla Walla, Washington, for most of the tenancy, the lease was for the benefit of the community. CP 8. Appellant argues that at the time of the show cause hearing on September 13, 2016, appellant had moved out of the home so he should therefore be free from any debt incurred after he left the home. However, appellant's wife and children continued to reside at the home, a clear benefit to the community. The damages to the home were a result of and incidental to living in the home, and therefore were also a debt incurred on behalf of the community. Thus, appellant should be equally liable for those damages as is his spouse.

C. Appellant lacks a meritorious defense to judgment.

A judgment shall not be vacated on motion or petition until it is adjudged that there is a valid defense to the action in which the judgment is rendered, or, if the plaintiff seeks its vacation, that there is a valid cause of action. RCW 4.72.050. This contemplates that a meritorious cause of action must exist before judgment can be vacated. RCW 4.72.050; *Handley v. Mortland*, 342 P.2d 612, 54 Wash.2d 489 (1959).

Appellant Sergio Rodriguez cannot put forth a meritorious defense to the judgment. Appellant alleges that he should not be liable for rent because he had moved from the premises. In the present matter, the parties had a verbal month-to-month lease. CP 1. A month-to-month tenancy is terminated by written notice of at least 20 days or more proceeding the end of any of the months or periods of the tenancy given by either party to the other. RCW 59.18.200(1)(a). Sergio Rodriguez never provided the landlord a written 20-day notice of termination. CP 27. Further, he continued to pay the rent, and his estranged wife and his children continued to live at the premises. CP 27. Given that the children continued to live at the premises, the tenancy was a community expense for which Sergio Rodriguez is obligated. Further, Sergio Rodriguez never provided the landlord with any forwarding address and, upon payment of rent each month, he himself affirmatively renewed the tenancy. RCW 59.18.200. Therefore, Mr. Rodriguez's argument that he is not liable for damage to the residence because he moved from the premises must fail.

D. Appellant Sergio Rodriguez had adequate opportunity to participate in court proceedings, yet failed to timely raise defenses through his own neglect.

Although a judgment may be inequitable, it will not be set aside nor will its enforcement be enjoined if it was the result of the complaining party's own fault or inexcusable neglect. *Fisch v. Marler*, 97 P.2d 147, 1 Wash.2d 698 (1939).

Mr. Rodriguez argues that he was not given an adequate opportunity to participate in court proceedings. However, this was due to appellant's own fault and neglect. The original Show Cause hearing was rescheduled and a court interpreter was provided so that he could fully participate in the Show Cause hearing held September 13, 2016. CP 8. At no time during the Show Cause hearing did Mr. Rodriguez argue that he was not adequately provided with an opportunity to respond. CP 7 and CP 8.

Thereafter Sergio Rodriguez was personally served with the Motion for Entry of Judgment, Note for Motion Docket and Cost Bill. CP 13. These pleadings were served on October 31, 2016. CP 13. The hearing was held on December 12, 2016. CP 15. Mr. Rodriguez had ample time to attain an attorney to assist him in this matter. He also had adequate time to answer the Motion. No answer was received and Mr. Rodriguez failed to appear at the hearing on Motion held on December 12, 2016. CP 15.

E. Appellant is improperly using a motion to vacate judgment as a substitute for an appeal.

A petition to vacate a judgment cannot be prosecuted as a substitute for an appeal. *Dawson v. Carstens*, 167 P. 86, 98 Wash. 96 (1917). In the present action, appellant filed a motion to vacate along with declarations contesting the damage to the residence. CP 22, CP 23, CP 24 and CP 25. This was done after the fact presumably as an attempt to refute or lessen the amount of the judgment against him. Appellant should have properly contested the Motion for Judgment prior to entry of the judgment or thereafter as an appeal. Instead, appellant ignored the action until his wages were garnished. CP 16, CP 18. Now appellant improperly used a motion to vacate the judgment as a means to appeal the judgment after the fact.

F. Respondent properly pled damages in his complaint and thereafter properly converted the action to request damages.

Where the right to possession ceases to be at issue at any time between commencement of an unlawful detainer action and trial of that action, the proceeding may be converted into an ordinary civil suit for damages, and the parties may then properly assert any cross claims, counterclaims, and affirmative defenses. *Munden v. Hazelrigg*, 105 Wash.2d 39, 711 P.2d 295 (1985).

Here, respondent in his request for relief in the complaint pled damages to the premises such as an amount to be established by supplemental affidavit supplied by the plaintiff, reasonable attorney fees of \$800 where no defense was interposed, and costs of the action. CP 1. Respondent, by filing a separate Motion for Judgment and supplemental affidavits, and by personally serving those pleadings on appellant, converted the original unlawful detainer action into a general action to collect those damages.

IV.

CONCLUSION

Appellant and respondents had a valid month-to-month rental agreement. Appellant's family significantly damaged the premises prior to moving. Appellant, as a tenant, is equally liable for those damages because they were caused by and incurred on behalf of the marital community during the lease. Respondents were properly awarded summary judgment for damages as pled in the respondents' Complaint and upon motion for summary judgment against appellant. Appellant appeared at two separate hearings and thereafter was personally served with the motion for summary judgment. Appellant chose to ignore the motion for judgment and judgment summary and accompanying Declaration personally served on him, and he failed to appear and argue at

time of hearing. The Motion for Judgment and Judgment Summary was thereafter properly granted. Appellant failed to submit any written answer until respondents garnished his wages.

Appellant fails to satisfy the requirements of CR 60 to justify vacating the Judgment and Judgment Summary. On the authority of CR 56 and CR 60, the Judgment and Judgment Summary should stand and the ruling of the trial court be affirmed.

DATED this 29 day of September, 2017.

MINNICK-HAYNER

By: Mona Geidl
Mona J. Geidl, WSBA #42455
Of Attorneys for Respondent



06-18-2017
10:00 AM
10:00 AM
10:00 AM

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WASHINGTON
COURTS



You may have the right to a court-appointed interpreter in a court case.
Please ask someone at the court information desk.

قد يحق لك الحصول على مترجم تعينه المحكمة في دعوى قضائية.
يرجى الاستفسار لدى مكتب استعلامات المحكمة.

Arabic

Koj muaj txoj cai tau ib tug neeg txhais lus uas yog tsev hais plaub muab los nyob rau ib qho kev
hais plaub. Thov nug ib tug neeg twg ntawm tsev hais plaub lub rooj muab lus qhia pab neeg.

Hmong

អ្នកមានសិទ្ធិសុំការបកប្រែនៅតុលាការ បើសិនជាអ្នកមិនយល់ភាសាខ្មែរ។
សូមសួរមនុស្សនៅតុលាការ ព្រមទាំងមន្ត្រីព័ត៌មានរបស់តុលាការ។

Khmer-Cambodian

당신의 법원 사건 처리를 위하여 당신은 법원선임 통역사의 도움을 받을 권리가 있을지도
모릅니다. 자세한 내용은 장구직원에게 문의하여 알아 보실 수 있습니다.

Korean

ທ່ານອາດມີສິດອໍ້າໃຫ້ສາມາດຕາມພາສາໃຫ້ທ່ານ ເມື່ອເວລາຮັບສານ. ກະລຸນາສອບຖາມ
ເຈົ້າໜ້າທີ່ທີ່ເຮັດວຽກຢູ່ໂຕະປະຊາສຳມັນ ຂອງສານ.

Lao

Dhimma mana murtittif, nama afaan siif hiiku kan mana murtiitiin qacarame dhaabbachuuf
mirga ni qabda. Kanaaf, nama bikka mana murtiitti tajaajila odeeffanno kennu gaafadhu.

Oromo

ਕਿਸੇ ਅਦਾਲਤੀ ਮੁਕੱਦਮੇ 'ਚ ਤੁਹਾਨੂੰ ਅਦਾਲਤ ਵੱਲੋਂ ਨਿਯੁਕਤ ਕੀਤਾ ਗਿਆ ਦੁਆਰੀਆ ਰੱਖਣ ਦਾ ਹੱਕ ਹੋ ਸਕਦਾ ਹੈ। ਕਿਰਪਾ
ਕਰਕੇ ਅਦਾਲਤ ਦੇ ਜਾਣਕਾਰੀ ਡੈਸਕ 'ਤੇ ਕਿਸੇ ਨੂੰ ਪੁੱਛੋ।

Punjabi

Возможно, Вы имеете право на помощь назначенного судом переводчика при судебном
рассмотрении Вашего дела. Спросите об этом в столе справок (Information Desk) суда.

Russian

E mata ona iai sou aiātatau i se fa'amatala'upu tōfia e le fa'amasinoga e fesoasoani 'iā te oe i lou
fa'amasinoga. Fa'amolemole, fesili 'i se tasi o i le laulau o fa'amatalaga mo le fa'amasinoga.

Samoan

U slučaju parnice imate pravo da vam sud odredi tumača. Molimo da o tome upitate osobu
kod šaltera za informacije.

Serbo-Croatian

在法院诉讼案件中，您有权利要求法院指派口译人员协助。请向法院信息服务台人员咨询。

Simplified Chinese

Waxaa dhici karto in aad xaq u yeelatid turjubaan maxkamada magacaawday inta u socdo
kiiska maxkamada. Fadlan weydii qofka joogo miiska macluumaadka maxkamada.

Somali

Usted podría tener derecho a un intérprete nombrado por el tribunal para asistirle con su caso
judicial. Por favor, pregunte en la mesa de información del juzgado.

Spanish

Maaring kayo ay may karapatan sa isang tagapagsalin na hinirang ng hukuman para sa inyong
kaso. Mangyaring magtanong sa information desk ng hukuman.

Tagalog

在法院訴訟案件中，您有權利要求法院指派的口譯人員協助。請向法院資訊櫃台的人員諮詢。

Traditional Chinese

Quý vị có quyền được một người thông dịch do tòa chỉ định trong vụ kiện toàn án. Xin hỏi nhân
viên làm việc tại bàn thông tin của tòa.

Vietnamese



WASHINGTON
COURTS
SUPERIOR COURT OF DISTRICT OF COLUMBIA

CERTIFICATE OF SERVICE

I hereby certify that on the 29 day of September, 2017, I caused to be served a true and correct copy of **RESPONDENT'S BRIEF** by the method indicated below, and addressed to the following:

Tyler Graber
Northwest Justice Project
38 E. Main, Suite 207
Walla Walla, WA 99362

☒ U.S. Mail, Postage Prepaid



JUDY LIMBURG

Signed this 29 day of September, 2017
at Walla Walla, Walla Walla County, WA

MINNICK HAYNER

September 29, 2017 - 2:26 PM

Transmittal Information

Filed with Court: Court of Appeals Division III
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Appellate Court Case Title: Luz Castellon, et vir v Sergio Rodriguez, et ux
Superior Court Case Number: 16-2-00602-8

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